

JOSHUA M. DICKEY
Nevada Bar No. 6621
ANDREA M. CHAMPION
Nevada Bar No. 13461
BAILEY ♦ KENNEDY
8984 Spanish Ridge Avenue
Las Vegas, Nevada 89148-1302
Telephone: 702.562.8820
Facsimile: 702.562.8821
JDickey@BaileyKennedy.com
AChampion@BaileyKennedy.com

*Attorneys for Defendants Sahara Outpatient
Surgery Center, Ltd.; and Surgicare of Las
Vegas, Inc.*

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

PAUL B. CANALE, M.D., an individual and
Alabama resident,

Plaintiff,

v.

SAHARA OUTPATIENT SURGERY CENTER,
LTD., a Nevada limited partnership;
SURGICARE OF LAS VEGAS, INC., a Nevada
corporation; LANCE HICKMAN, an individual
and Tennessee resident; DOES I through X; ROE
CORPORATIONS I through X, inclusive,

Defendants.

Case No. 2:18-cv-01020-GMN-VCF

**STIPULATION AND ORDER TO
EXTEND DEADLINE FOR SAHARA
OUTPATIENT SURGERY CENTER,
LTD. AND SURGICARE OF LAS
VEGAS, INC. TO RESPOND TO
COMPLAINT**

(First Request)

Plaintiff Paul B. Canale, M.D. ("Plaintiff"), together with Defendants Sahara Outpatient Surgery Center, Ltd. and Surgicare of Las Vegas, Inc. (collectively, the "Surgery Center Parties"), by and through their respective attorneys of records, stipulate and agree as follows:

1. On June 5, 2018, the Surgery Center Parties filed their Petition for Removal, removing this case from state to federal court [Dkt. #1].
2. The Surgery Center Parties did not file a response to the Complaint prior to removal. Therefore, pursuant to Fed. R. Civ. P. 81(c)(2)(C), the Surgery Center Parties' response to Plaintiff's Complaint is currently due June 12, 2018.

3. The parties stipulate and agree that the date for the Surgery Center Parties' response to Plaintiff's Complaint shall be continued from June 12, 2018 to June 19, 2018.

4. Additional time is needed for the Surgery Center Parties' counsel to confer with the Surgery Center Parties regarding Plaintiff's claims and to prepare a response to the Complaint.

5. This is the first stipulation for an extension of time for the Surgery Center Parties to file their responsive pleading to Plaintiff's Complaint. This stipulation is made in good faith and not to delay the proceedings.

IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

DATED this 12th day of June, 2018.

DATED this 12th day of June, 2018.

WOODS ERICKSON & WHITAKER LLP

BAILEY ♦ KENNEDY

By: /s/ Brian C. Whitaker
BRIAN C. WHITAKER
1349 Galleria Drive
Suite 200
Henderson, NV 89014

By: /s/ Andrea M. Champion
JOSHUA M. DICKEY
ANDREA M. CHAMPION
8984 Spanish Ridge Avenue
Las Vegas, NV 89148

Attorneys for Plaintiff Paul B. Canale, M.D.

*Attorneys for Defendants Sahara Outpatient
Surgery Center, Ltd. and Surgicare of Las
Vegas, Inc.*

IT IS SO ORDERED.


UNITED STATES MAGISTRATE JUDGE

DATED: June 12, 2018